

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK - WHITE PLAINS DIVISION

SCREWS & MORE, LLC.,

Plaintiff,

Civil Action No.:
07-Civ3637
(WP4)(LMS/MDF/GAY)

-against-

**PECORA CORP., KENSEAL CONSTRUCTION
PRODUCTS CORP., & GARVIN BROWN CONSTRUCTION
PRODUCTS, LLC.,**

Defendants.

**JOINT MOTION TO MODIFY
CIVIL CASE MANAGEMENT PLAN**

Plaintiff, Screws and More, LLC ("Screws and More") and Defendants Pecora Corporation ("Pecora"), Kenseal Construction Products Corporation ("Kenseal"), and Garvin Brown Construction Products, LLC ("Garvin Brown"), submit this joint motion to modify the Civil Case Management Plan filed on September 17, 2007.

The parties have agreed to the following, subject to approval by the Court:

1. All parties must produce Rule 26 disclosures no later than **May 15, 2008**.
2. All discovery must be completed on or before **September 30, 2008**.
3. Plaintiff's expert reports must be produced no later than **October 31, 2008**.
4. Defendants' expert reports must be produced no later than **December 15, 2008**.
5. Expert depositions must be completed by **January 31, 2009**.

Accordingly, the parties respectfully request that the Court grant these modifications to the Civil Case Management Plan.

Dated: April 3, 2008

Respectfully Submitted,

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